

10/18/84 NMEID

NEW MEXICO
HAZARDOUS WASTE COMPLIANCE INSPECTION REPORT
TSD FACILITIES CHECKLIST

Inspector: _____

Date of Inspection: _____

Facility: _____

Section A -- General Facility Standards.

1. Does the facility have an EPA Identification No.? [206.B.1. - Identification Number] ☒ Yes ☐ No

a. If yes, EPA I.D. No. NME 003212332
If no, explain _____

2. Has facility received hazardous waste from a foreign source? [206.B.2. - Required notices] ☐ Yes ☒ No

a. If yes, has he filed a notice with the Director? ☐ Yes ☒ No N/A

Waste Analysis:

3. Has the owner/operator obtained a detailed chemical and physical analyses of representative samples of all hazardous wastes prior to treating, storing or disposing of those wastes? ☒ Yes ☐ No

If yes,

a. Have the analyses been repeated as the process or operations generating the wastes change? No changes ☒ Yes ☐ No N/A

****** b. For off-site facilities are analyses repeated when the waste received does not match the waste identified on the accompanying manifest? Dumping + Rio Rancho ☒ Yes ☒ No

4. For off-site facilities, is each shipment of hazardous waste received at the facility inspected and if necessary, analyzed to determine if it corresponds to the waste listed on the accompanying manifest? ☒ Yes ☐ No

5. Does the facility have a written waste analysis plan? [206.B.3. - General Waste Analysis] ☒ Yes ☐ No

a. If yes, is a copy maintained at the facility? ☒ Yes ☐ No

6. If yes, does the plan include the following:

a. Parameters for which each waste will be analyzed and the rationale for selection of these parameters? ☒ Yes ☐ No

b. Test methods used to test for these parameters? ☒ Yes ☐ No

c. Sampling method used to obtain a representative sample? ☒ Yes ☐ No

d. Frequency with which the initial analysis will be reviewed or repeated? ☒ Yes ☐ No

1. If yes, does it include the requirements to re-test when the process or operation generating the waste has changed? ☒ Yes ☐ No

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** e. (For off-site facilities) Waste analyses that generators have agreed to supply? Subsidiaries ☐ Yes ☒ No CKE

f. (For off-site facilities) Procedures which are used to inspect and analyze each shipment of hazardous waste received at the facility, including:

1. Procedures to be used to determine the identity of each movement of waste? ☒ Yes ☐ No

2. Sampling method to be used to obtain representative sample(s) of the waste to be identified? ☒ Yes ☐ No

7. Does the facility provide adequate security to minimize the possibility for the unauthorized entry of persons or livestock onto the active portions of the facility? [206.B.4. - Security] ☒ Yes ☐ No

If no, describe describe the situation at the facility; document the facilities exemption if applicable.

If not exempt, is security provided through:

a. 24-hour surveillance system which continuously monitors and controls entry onto the active portion? (e.g. television monitoring or guards) ☒ Yes ☐ No

OR

b. 1. Artificial or natural barrier completely surrounding the active portion? (e.g. fence or fence and cliff)? ☒ Yes ☐ No
Describe type of security: fence + locked gates

AND

2. Means to control entry at all times through the gates or other entrances to the active portion (e.g. attendant, television monitors, locked entrance, controlled roadway access)? ☒ Yes ☐ No
Describe type of security: locked gates / access to bldg passes attendant
include a drawing indicating any inadequacies in the facility's security system.

8. Is a sign with the legend, "Danger - Unauthorized Personnel Keep Out," posted at the entrance and at other locations in sufficient numbers to be seen from any approach to the the active portion? [206.B.4. - Security] ☒ Yes ☐ No

Is it written in English and Spanish and legible from at least 25 feet? ☒ Yes ☐ No

If an existing sign with a legend other than "Danger - Unauthorized Personnel Keep Out," what does the legend say? N/A

General Inspection Requirements.

9. a. Does the owner/operator maintain a written schedule for inspecting: [206.B.5. - General Inspection Requirements]

1. Monitoring equipment? (If applicable) ☐ Yes ☐ No N/A

2. Safety and emergency equipment? ☒ Yes ☐ No

3. Security devices? ☒ Yes ☐ No
4. Operating and structural equipment? (If applicable) ☐ Yes ☐ No *N/A*
5. Does the schedule or plan identify the types of problems to be looked for during inspection? ☒ Yes ☐ No
- a. Malfunction or deterioration (e.g. inoperative sump pump, leaking fitting, eroding dike, corroded pipes or tanks, etc.). ☒ Yes ☐ No
- b. Operator error. ☒ Yes ☐ No
- c. Discharges (e.g. leaks from valves or pipes, joint breaks, etc.). ☒ Yes ☐ No
- b. Is a written schedule for these inspections maintained at the facility? ☒ Yes ☐ No
1. Are these inspections conducted? ☒ Yes ☐ No
- a. Is a record of these inspections maintained in the inspection log? ☒ Yes ☐ No
10. Does the owner/operator have an inspection log? [206.B.5. - General Inspection Requirements] ☒ Yes ☐ No
- a. If yes, does it include:
1. Date and time of inspection? *date only* ☐ Yes ☒ No
2. Name of inspector? *initials* ☐ Yes ☒ No
3. Notation of observations? *items "✓" and* ☒ Yes ☐ No
4. Date and nature of repairs or remedial action? ☐ Yes ☐ No *N/A*
- b. Are there any malfunctions or other deficiencies noted in the inspection log that remain uncorrected? (Use narrative explanation sheet) ☐ Yes ☐ No *N/A*
- c. Are records of the inspection log maintained at the facility for three (3) years? ☐ Yes ☐ No

Personnel Training.

11. Does the owner/operator maintain a personnel training program? [206.B.6. - Personnel Training] ☒ Yes ☐ No
- a. Have facility personnel successfully completed a program of classroom or on-the-job training? *Feb. 26, 85* ☒ Yes ☐ No
- b. Does the training program include instruction in the following:
1. Procedures for using, inspecting, repairing and replacing facility emergency and monitoring equipment. ☒ Yes ☐ No
2. Key parameters for automatic waste feed cut-off systems. ☐ Yes ☐ No *N/A*

3. Operation of communication or alarm systems. ☒ Yes ☐ No
4. Response to fires, explosions and groundwater contamination incidents. ☒ Yes ☐ No
5. Shutdown of operations. ☒ Yes ☐ No
6. General hazardous waste management procedures. ☒ Yes ☐ No
- c. Is the program directed by a person trained in hazardous waste management procedures? ☒ Yes ☐ No
- d. Is the program designed to prepare employees to respond effectively to hazardous waste emergencies? ☒ Yes ☐ No
- e. Is a training review given annually? ☒ Yes ☐ No
- f. Does the owner/operator keep the following records:
 1. Job title, job description and the name of employee for each position at the facility related to hazardous waste management. ☒ Yes ☐ No
 2. Description of the type and amount of introductory and continuing training to be provided for each position? ☒ Yes ☐ No
 3. Documentation that training has been given to employees? ☒ Yes ☐ No
- g. Are these records maintained at the facility? ☒ Yes ☐ No

Requirements for Ignitable, Reactive or Incompatible Waste.

12. Does the facility handle ignitable or reactive waste(s)?
[206.B.7. - Ignitable, Reactive, Incompatible Wastes] ☒ Yes ☐ No
Waste
[Circle appropriate type(s) of waste(s)]
 - a. If yes, is waste separated and confined from sources of ignition or reaction (e.g., open flames, smoking, cutting and welding, hot surfaces, frictional heat), sparks (static electrical or mechanical), spontaneous ignition (e.g. from heat producing chemical reactions) and radiant heat? ☒ Yes ☐ No
 - b. Are smoking and open flame confined to specifically designated locations? ☒ Yes ☐ No
 - c. Are "No Smoking" signs posted in hazardous areas where ignitable or reactive wastes are handled? ☒ Yes ☐ No
 - d. Is waste handled in a manner which generates extreme heat, pressure, violent reaction, toxic fumes or other dangers to human health or the environment? ☐ Yes ☒ No

Section B -- Preparedness and Prevention.

1. Is there evidence of fire, explosion or contamination of the environment? [206.B.9. - Maintenance and operation of facility] ☐ Yes ☒ No
- If yes, use narrative explanation sheet to explain.

2. Is the facility equipped with [206.B.9.(c). - Required equipment]:

- a. Internal communications or alarm system? ☒ Yes ☐ No
1. Is it readily accessible in case of emergency? ☒ Yes ☐ No
- b. Telephone or two-way radio to call emergency response personnel? ☒ Yes ☐ No
- c. Portable fire extinguishers, fire control equipment, spill control equipment and decontamination equipment? ☒ Yes ☐ No
1. Is this equipment tested to assure its proper operation? ☒ Yes ☐ No
- d. Water of adequate volume for hoses, sprinklers or water spray system? ☒ Yes ☐ No
1. Describe source of water: NM Utilized (from own pub util)
2. Indicate flow rate and/or pressure and storage capacity, if applicable: N/A 110 PSI

3. Is there sufficient aisle space to allow unobstructed movement of personnel and equipment? (e.g. adequate aisle space in between barrels to check for leakage, corrosion and proper labeling, etc.) [206.B.9.(g). - Required Aisle Space]

☒ Yes ☐ No

4. Has the owner/operator made arrangements with the local authorities to familiarize them with characteristics of the facility? (e.g., layout of facility, properties of hazardous waste handled and associated hazards, places where facility personnel would normally be working, entrances to roads inside facility, possible evacuation routes) [(206.B.9.(h). - Arrangements with local authorities)]

☒ Yes ☐ No

If no, has the owner/operator attempted to make such arrangements?

☐ Yes ☐ No N/A

5. In the case that more than one police or fire department might respond, is there a designated primary authority? [206.B.9.(h). - Arrangements with local authorities]

☒ Yes ☐ No

If yes, indicate the primary authority: Panama Hills / Bernillo Co. Fire

a. Is the fire department a city or volunteer fire department?

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6. Does the owner/operator have phone numbers of, and agreements with, State emergency response teams, emergency response contractors and emergency suppliers? [206.B.9.(h). - Arrangements with local authorities]

☒ Yes ☐ No

Are they readily available to the emergency coordinator?

☒ Yes ☐ No

7. Has the owner/operator arranged to familiarize local hospitals with the properties of hazardous waste handled and types of injuries that could result from fire, explosions, or releases at the facility? [206.B.9.(h). - Arrangements with local authorities]

☒ Yes ☐ No

If no, has the owner/operator attempted to do this?

☐ Yes ☐ No N/A

8. If the State, or local authorities, decline to enter into the above referenced agreements, has this situation been entered in the operating record? [206.B.9.(h). - Arrangements with local authorities]

___ Yes ___ No *N/A*

Section C -- Contingency Plan and Emergency Procedures.

1. Does the facility have a contingency plan? [206.B.10. - Content of Contingency Plan]

☒ Yes ___ No

a. If yes, does it contain:

1. Actions to be taken in response to emergencies?

☒ Yes ___ No

2. Description of arrangements with police, fire and hospital officials?

☒ Yes ___ No

3. List of names, addresses, phone numbers of persons qualified to act as the Emergency Coordinator?

☒ Yes ___ No

4. List of all emergency equipment at the facility?

☒ Yes ___ No

5. Evacuation plan for facility personnel?

☒ Yes ___ No

2. Is a copy of the contingency plan maintained at the facility? [206.B.10.(j). - Copies of Contingency Plan]

☒ Yes ___ No

3. Has a copy been supplied to the local police and fire depts.? [206.B.10.(j). - Copies of Contingency Plan]

☒ Yes ___ No

4. Has the contingency plan been amended as necessary?

☒ Yes ___ No

5. Is the plan a revised SPCC Plan? [206.B.10. - Content of Contingency Plan]

___ Yes ☒ No

6. Is there an emergency coordinator on-site or within short driving distance of the plant at all times?

☒ Yes ___ No

If yes, list primary emergency coordinator: Pat Durkin

Section D -- Manifest System, Recordkeeping and Reporting.

1. Has the facility received hazardous waste from off-site since November 19, 1980? [203.C.1.(a). - Use of Manifest System]

☒ Yes ___ No

a. If no, questions 1, 2, and 3 are not applicable.

b. If yes, does the facility retain copies of all manifests?

☒ Yes ___ No

1. Are the manifests signed and dated and returned to the generator?

☒ Yes ___ No

2. Is a signed copy given to the transporter?

☒ Yes ___ No

2. Has the facility received any hazardous waste from a rail (bulk shipment) transporter since Nov. 19, 1980? [203.C.1.(b). - Use of Manifest System]

___ Yes ☒ No

a. If yes, is it accompanied by a shipping paper?

___ Yes ___ No *N/A*

1. Does the owner/operator sign and date the shipping paper and return a copy to the generator? ☐ Yes ☐ No *N/A*
2. Is a signed copy given to the transporter? ☐ Yes ☐ No *↓*
3. Has the facility received any shipments of hazardous waste since November 19, 1980, which were inconsistent with the manifest? [203.C.1.(d). - Manifest Discrepancies] ☐ Yes ☒ No
- a. If yes, has he resolved the discrepancy with the generator and transporter? ☐ Yes ☐ No *N/A*
1. If no, has the Director been notified? ☐ Yes ☐ No *N/A*
4. Has the facility received any waste (that does not come under the small generator exclusion) not accompanied by a manifest? [203.C.3.(b). - Unmanifested Waste Report] ☐ Yes ☒ No *↓*
- a. If yes, has he submitted an unmanifested waste report to the Director? ☐ Yes ☐ No *NA*
5. Does the facility have a written operating record? [203.C.2.(c). - Operating Record] ☒ Yes ☐ No
- a. Is a copy maintained at the facility? ☒ Yes ☐ No
- b. Does the record include:
 1. Description and quantity of each hazardous waste and the methods and dates of its treatment, storage or disposal at the facility? ☒ Yes ☐ No
 2. Location and quantity of each hazardous waste at each location? ☒ Yes ☐ No
 - a. Is this information cross-referenced with specific manifest numbers, if applicable? ☒ Yes ☐ No
 3. (For disposal facilities only) Is the location and quantity of each hazardous waste recorded on a map or diagram of each cell or disposal area? ☐ Yes ☐ No *N/A*
 4. Record and results of waste analyses? ☒ Yes ☐ No
 5. Reports of incidents involving implementation of the contingency plan? (If applicable) ☐ Yes ☐ No *NA*
 6. Records and results of required inspections? ☒ Yes ☐ No
 7. Monitoring, testing or analytical data where required? ☒ Yes ☐ No
 8. Closure cost estimates and for disposal facilities post-closure cost estimates? ☒ Yes ☐ No

Section E -- Plans and Reports.

1. Have all plans and reports been visually inspected and/or been made available for inspection? [203.C.2.(d). - Availability, retention and disposition of records] ☒ Yes ☐ No

List plans and/or reports not made available for inspection:

2. Did operator provide inspector with a drawing of the facility? ☒ Yes ☐ No

a. If yes, please indicate which are hazardous waste facilities on the drawing. *See Part A attached to Generator %*

3. Indicate the types of hazardous waste facilities:

- ☒ Containers
- ☐ Tanks
- ☒ Surface Impoundments
- ☐ Waste Piles
- ☐ Land Treatment
- ☐ Landfill
- ☐ Incinerator
- ☐ Thermal Treatment
- ☐ Chemical, Physical and Biological Treatment
- ☒ Groundwater Monitoring Program

Comments:

Do you have a copy of NMHWMR-1984? ☒ Yes ☐ No

* No discrepancies noted, therefore none remain uncorrected.

* Post inspection note: The inspection sheet is checked "✓", no observations are noted. The form lists the areas - Container Storage, SI and security. The written instructions specify areas to be looked at and items to look for.

** The WAP does not address receipt of *Note* ← wastes from Sparrow's Rio Rancho or Damin facilities.